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**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

IN RE DUCTILE IRON PIPE
FITTINGS (“DIPF”) DIRECT
PURCHASER ANTITRUST
LITIGATION

Civ. No. 12-711 (AET)(LHG)

**NOTICE OF MOTION IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS’ MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT WITH
DEFENDANT STAR PIPE PRODUCTS, LTD.**

TO: COUNSEL OF RECORD

PLEASE TAKE NOTICE that on August 3, 2015, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for the Direct Purchaser Plaintiffs in the above-captioned action shall move before the Hon. Anne E. Thompson, U.S.D.J., Clarkson S. Fisher Federal Building, & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of a Preliminary Approval Order:

1. Preliminarily approving the Settlement Agreement between Direct Purchaser Plaintiffs and Star Pipe Products, Ltd. and finding that its terms are sufficiently fair, reasonable, and adequate for notice to be issued to the Settlement Class as defined in the Settlement Agreement;
2. Certifying the Settlement Class, for purposes of settlement only pursuant to Federal Rule of Civil Procedure 23(c), and authorizing plaintiffs to represent the Settlement Class; and
3. Approving Garden City Group, LLC as Administrator of the Settlement, and Citibank, N.A. as escrow agent.

In support of this motion, Direct Purchaser Plaintiffs rely upon the Memorandum of Law in Support of Direct Purchaser Plaintiffs' Motion for Preliminary Approval of Settlement with Star Pipe Products, Ltd., as well as the accompanying Declaration of Robert N. Kaplan.

Direct Purchaser Plaintiffs submit a proposed form of Order.

Dated: July 6, 2015

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